

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as  
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager  
of the M/V DALI,

for Exoneration from or Limitation of  
Liability

Civ. No. 24-00941-JKB

***IN ADMIRALTY***

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Petitioners and Claimants (hereinafter collectively the “Parties”), through undersigned counsel, submit this Joint Motion to Modify the Court’s Scheduling Order.

The Parties have been working cooperatively on discovery. Nevertheless, the production of documents by Petitioners has been challenging given the volume of documents involved and related circumstances. Thus far, Petitioners have produced nearly 700,000 pages of documents. They anticipate substantially completing their document production by May 30.

In addition to the voluminous number of documents being produced in this matter, there are still a significant number of fact witness depositions that need to be conducted. While the Parties have compromised on the location of these depositions in the interest of expediency, there are still challenges in scheduling the depositions as some witnesses are currently at sea working on vessels or are still in the process of obtaining the visas required to attend the depositions. The Parties have taken eleven depositions to date and expect to complete another five in the next few

weeks. However, most of the remaining depositions must await Petitioners' completion of their document production.

To ensure that Claimants have a meaningful opportunity to receive and review all responsive documents prior to the conclusion of fact discovery and so that all fact witness depositions may be conducted, the Parties jointly move the Court for a modest amendment of the Court's Scheduling Order (ECF No. 438), as outlined below:

<b><u>Current Deadline</u></b>	<b><u>Subject</u></b>	<b><u>Proposed Deadline</u></b>
July 16, 2025	Fact Discovery	August 29, 2025
July 16, 2025	Rule 56 Motion Concerning Synergy Marine	August 29, 2025
August 29, 2025	Claimants' Rule 26(a)(2) Disclosures	October 13, 2025
October 31, 2025	Petitioners' Rule 26(a)(2) Disclosures	December 12, 2025
November 21, 2025	Claimants' Rebuttal Rule 26(a)(2) Disclosures	January 16, 2026
February 27, 2026	Expert Discovery; Supplementation of Disclosures	March 27, 2026
February 27, 2026	Submission of Joint Status Report	March 27, 2026
March 9, 2026	Requests for Admission	April 3, 2026

The Parties do not move to amend any other deadlines set forth in ECF No. 438.

Respectfully submitted this 2<sup>nd</sup> day of May 2025.

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/s/ David L. Reisman

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of May 2025, a copy of the foregoing pleading was served via the court's CM/ECF system on all counsel of record.

/s/ David L. Reisman  
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